

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

YARON KWELLER,

Plaintiff,

-against-

MEMORANDUM OF LAW

3:24-CV-1328 (ECC-ML)

THE COUNTY OF BROOME, THE CITY OF BINGHAMTON, THE BROOME COUNTY DISTRICT ATTORNEY'S OFFICE, DISTRICT ATTORNEY MICHAEL A. KORCHAK, CHIEF ASSISTANT DISTRICT ATTORNEY MARK LOUGHRAN, ASSISTANT DISTRICT ATTORNEY ALYSSA CONGDON, ASSISTANT DISTRICT ATTORNEY AMANDA CRONIN, DISTRICT ATTORNEY INVESTIGATOR JEFF J. WAGNER, BINGHAMTON POLICE CHIEF JOSEPH ZIKUSKI, BINGHAMTON POLICE DEPARTMENT CAPTAIN CORY MINOR, BINGHAMTON POLICY DEPARTMENT INVESTIGATOR AMANDA MILLER, all in their individual capacities, and JOHN DOES ## 1-10 representing Broome County District Attorney's Office and Police Department Employees Whose Names Are Currently Unknown, HAILEY DEMKOVICH, and SAMANTHA HERCEG,

Defendants.

PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law, the undersigned, on behalf of Defendant Amanda Cronin (hereinafter "Ms. Cronin"), shall move this Court upon submission of the papers before the Honorable Elizabeth C. Coombe, United States District Court Judge for an order pursuant to Federal Rule of Civil Procedure 12(c) for judgment on the pleadings in Ms. Cronin's favor and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 7.1(a)(1) of the Local Rules of Practice of the United States District Court for the Northern District of New York, any papers to be submitted in opposition to this motion must be filed with the Clerk of the Court and served

upon counsel for Ms. Cronin no more than twenty-one (21) days after service of this motion, or on such other date as ordered by the Court.

DATED: February 24, 2025

CAPEZZA HILL, LLP



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